

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Case No. 20-17355
)	
JAMES SAMATAS,)	Chapter 11
)	
Debtor.)	Judge A. Benjamin Goldgar

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **January 25, 2021, at 10:00 a.m.**, I will appear before the Honorable A. Benjamin Goldgar and present **Cohen & Lord, P.C.'s Motion to Join the Motion of Carlye Goldberg Samatas to Convert Case to Chapter 7 [Dkt No. 36]**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and to be heard on the motion, you must to the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password. **To appear by telephone**, call Zoom for Government at 1669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password. The meeting ID for this hearing is 161 500 0972 and the password is 726993. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Date: January 19, 2021

Respectfully submitted:

By: \s\ Timothy R. Herman
Timothy R. Herman (6301721)
Gordon & Rees Scully Mansukhani
One North Franklin, Suite 800
Chicago, IL 60606
therman@grsm.com
Attorney for Creditor Cohen & Lord P.C.

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**COHEN & LORD, P.C.'S MOTION TO JOIN THE MOTION OF CARLYE
GOLDBERG SAMATAS TO CONVERT CASE TO CHAPTER 7 [DKT NO. 36]**

Cohen & Lord, P.C. ("Cohen & Lord"), a creditor, by and through its undersigned counsel, joins in the Motion of Carlye Goldberg Samatas to Convert Case to Chapter 7 and previously filed as Docket No. 36 and adopts the arguments contained therein.

1. Cohen & Lord is a creditor of James Samatas. Cohen & Lord represented James Samatas in a California state court proceeding styled, *Carlye Samatas, et al. v. Nile Niami, et al*, LASC Case No. BC456738 (the "California State Court Proceeding").

2. Mr. Samatas owes Cohen & Lord extensive attorney fees and costs incurred by Cohen & Lord during their representation of Mr. Samatas in the California State Court Proceeding. As a result, Cohen & Lord is a creditor of Mr. Samatas.

3. Cohen & Lord seeks the same relief sought by Carlye Goldberg Samatas: conversion of the instant case to a Chapter 7 case.

WHEREFORE, Cohen & Lord, P.C. respectfully requests that (1) it be given leave to join the Motion of Carlye Goldberg Samatas to Convert Case to Chapter 7 [Dkt No. 36], (2) that this Court exercise its authority to convert this case to a Chapter 7 case and immediately appoint a Chapter 7 Trustee to investigate the Debtor's assets, liabilities, income and expenses, and (3) for all other relief this Court deems fair and proper.

Respectfully submitted:

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Chicago, IL 60606
therman@grsm.com
Attorney for Creditor Cohen & Lord P.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th Day of January 2021, a true and correct copy of **Cohen & Lord, P.C.'s Motion to Join the Motion of Carlye Goldberg Samatas to Convert Case to Chapter 7 [Dkt No. 36]** was served on all parties who requested to receive notice of filings via the Court's CM/ECF system and the following parties via first-class mail:

David P. Holtkamp, Esq.
Office of the United States Trustee
219 S. Dearborn Street, Room 873
Chicago, IL 60604

James Samatas
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Monroe, LA 71201

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Chicago, IL 60604

West Suburban Bank
PO Box 1269
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Respectfully submitted:

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